

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BROOKE PEARCE, as next of friend of §  
U.V., a minor, and JUSTINA GARCIA, §

*Plaintiffs,* §

v. §

Civil Action No. 4:18-cv-3196

FBI AGENT DOE, *in his individual* §  
*capacity,* §

NICHOLAS CHASE CUNNINGHAM; §

SOPHIA PEREZ HEATH; §

JIMMY TONY SANCHEZ; §

DELIA GUALDINA VELASQUEZ; and §

THE UNITED STATES, §

*Defendants.* §

MOTION TO QUASH PLAINTIFFS' CROSS NOTICE DEPOSITIONS

# Government's Exhibit A



**U.S. Department of Justice**  
United States Attorney's Office  
Southern District of Texas  
Civil Division

Ariel N. Wiley  
Assistant U.S. Attorney  
[Ariel.Wiley@usdoj.gov](mailto:Ariel.Wiley@usdoj.gov)

1000 Louisiana, Suite 2300  
Houston, Texas 77002  
(713) 567-9344

February 1, 2024

*Via E-Mail*

U.A. Lewis  
The Lewis Law Group  
P.O. Box 27353  
Houston, TX 77227  
713-570-6555  
[myattorneyatlaw@gmail.com](mailto:myattorneyatlaw@gmail.com)

Randall Lee Kallinen  
Kallinen Law PLLC  
511 Broadway St.  
Houston, TX 77012-1709  
713-320-3785  
[attorneykallinen@aol.com](mailto:attorneykallinen@aol.com)

Re: *Brooke Pearce, as next of friend of U.V., a minor, and Justina Garcia v. The United States*; et al., - Civil Action No. 4:18-CV-03196

Dear Counsel,

Defendant United States' hereby requests to take the depositions of the following individuals:

- (1) Ulysses Valladares
- (2) Brooke Pearce
- (3) Justina Garcia
- (4) Dr. Robbie Burnett
- (5) Ernesto Valladares
- (6) Dr. William Reading
- (7) Dr. Roopa Challapalli, MD
- (8) Lenda Martinez, LPC
- (9) Amanda Williams, LPC
- (10) Emleigh Mitchell, LMSW
- (11) Dr. Danny Dang
- (12) Nicholas Chase Cunningham
- (13) Jimmy Tony Sanchez
- (14) Delia Velasquez
- (15) Sophia Perez Heath

These requests may change depending on what Plaintiffs produce in discovery or what these witnesses testify to in their depositions. Please confirm by **February 7, 2024**, whether Plaintiffs are opposed to Defendant's request to take more than 10 depositions. If we do not receive a response by then, Defendant will assume that Plaintiffs are opposed.

Other than Ulysses Valladares and Justina Garcia please identify which witnesses Plaintiffs intend to bring voluntarily to the deposition. Any witness that is not brought voluntarily will need to be subpoenaed. Please identify which witnesses Plaintiffs will bring voluntarily by **February 7, 2024**.

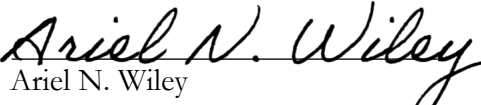
By **February 16, 2024**, please provide all dates between March 4, 2024 – May 3, 2024, that Ulysses Valladares, Justina Garcia, and any other witness you intend to bring voluntarily are available to be deposed.

By **February 9, 2024**, please provide all dates between March 4, 2024 – May 24, 2024, that Plaintiffs' counsel are available for depositions for the remaining witnesses.

If we do not receive availability by the above dates, Defendants shall assume that Plaintiffs, their counsel, and any remaining witnesses are available for all dates, and proceed accordingly.

Respectfully,

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY

  
Ariel N. Wiley  
Assistant United States Attorney